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8 **Attorneys for Plaintiff**
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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 ENTROPIC COMMUNICATIONS, LLC,

13 Plaintiff,

14 v.

15 DISH NETWORK CORPORATION, *et*
16 *al.*,

17 Defendants.
18

19 ENTROPIC COMMUNICATIONS, LLC,

20 Plaintiff,

21 v.

22 COX COMMUNICATIONS, INC., *et al.*,

23 Defendants.
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27
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Case No.: 2:23-cv-01043-JWH-KES
(Lead Case)

Case No.: 2:23-cv-01047-JWH-KES
(Related Case)

Case No.: 2:23-cv-01048-JWH-KES
(Related Case)

Case No.: 2:23-cv-05253-JWH-KES
(Related Case)

[Assigned to the Honorable John W.
Holcomb]

**ENTROPIC COMMUNICATIONS,
LLC'S APPLICATION TO FILE
DOCUMENTS UNDER SEAL
REGARDING ENTROPIC'S
MOTION TO DISMISS DISH'S
COUNTERCLAIMS;
DECLARATION OF CASSIDY T.
YOUNG; [PROPOSED] ORDER**

1 ENTROPIC COMMUNICATIONS, LLC,

2 Plaintiff,

3
4 v.

5 COMCAST CORPORATION, *et al.*,

6 Defendants.

7
8 ENTROPIC COMMUNICATIONS, LLC,

9 Plaintiff,

10
11 v.

12 DIRECTV, LLC, *et al.*,

13 Defendants.

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District of California Local Rule 79-5.2.2(a), Plaintiff Entropic Communications, LLC (“Entropic” or “Plaintiff”) hereby applies for an order sealing **unredacted** information referenced in Entropic’s Motion to Dismiss Dish Network Corp., Dish Network LLC, Dish Network Service LLC, Dish Network California Service Corp., and Dish Technologies, LLC’s (collectively, “DISH”) Counterclaims, which contains: (1) details related to terms of a confidential agreement between Plaintiff Entropic and a third-party entity and (2) contents of documents designated as confidential by DISH.

Each portion of the document referenced in the chart below has been designated as confidential pursuant to agreements reached between third parties or have been filed under seal by DISH. (*See* Decl. of Cassidy T. Young in Support of Entropic’s Application to File Documents Under Seal, ¶ 4.) Entropic, therefore, applies to file such documents and information under seal pursuant to Local Rule 79-5.2.2(a).

The information to be sealed is identified below:

Item to be Sealed Pursuant to L.R. 79-5.2.2(a)	Description of Information
Portions of Entropic’s Motion to Dismiss DISH’s Counterclaims (“Motion”) at 9:19–22.	Terms of confidential agreement between Entropic and a third-party entity.
Portions of Motion at 18:2–11.	Terms of confidential agreement between Entropic and a third-party entity.
Portions of Motion at 18:16–18.	Contents of documents designated as confidential by DISH.
Portions of Motion at 18:20–21.	Contents of documents designated as confidential by DISH.

1 Pursuant to Local Rule 79-5.2.2(a), Entropic applies to file under seal the
2 document listed above. Under Rule 79-5.2.2(a), a party may seek leave to file a
3 document under seal so long as the Application describes the nature of the information
4 that should be closed to public inspection and is accompanied by: (1) a declaration
5 establishing good cause why the strong presumption of public access in civil cases
6 should be overcome and informing the Court whether anyone opposes the Application;
7 (2) a proposed order; (3) a redacted version of the relevant documents; and (4) an
8 unredacted version of the relevant documents. Entropic has complied with these
9 requirements. The information that Entropic seeks to seal is contained within: (1)
10 details related to the terms of a confidential agreement between Entropic and a third-
11 party entity and (2) contents of documents which DISH designated confidential. The
12 public does not have an interest in accessing this confidential information.
13 Additionally, Entropic's request is narrowly tailored to only prevent the public from
14 viewing confidential information. Finally, counsel for DISH did not indicate whether it
15 intended to oppose Entropic's under seal filing.

16 Therefore, compelling reasons exist to seal the highlighted portions of the above
17 documents. *See Aya Healthcare Servs., Inc. v. AMN Healthcare, Inc.*, 2020 WL
18 1911502, at *5 (S.D. Cal. Apr. 20, 2020) ("The Court agrees that compelling reasons
19 exist to seal references . . . to Defendants' proprietary business records that detail
20 sensitive financial terms, proprietary business strategies, and confidential negotiations
21 and agreements with third parties."); *In re Qualcomm Litig.*, 2019 WL 1557656, at *3
22 (S.D. Cal. Apr. 10, 2019) (granting motions to seal "confidential business information
23 of the parties, including trade secrets, proprietary business records, discussions of
24 internal strategy, company dealings, and materials designated as 'Highly
25 Confidential'").

26 Accordingly, Entropic respectfully requests that this Court order the unredacted
27 documents to be filed under seal. Concurrent with this filing, Entropic has filed
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1 redacted versions of these documents with the Court, which only redact information
2 necessary to protect confidential, private, and otherwise non-public information therein.
3

4 Dated: February 21, 2024

Respectfully Submitted,

5 By: /s/ Cassidy T. Young
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27 ***Communications, LLC***
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